

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Mahmoud Khalil, et al.,

Plaintiffs,

v.

Columbia University and the Trustees of
Columbia University, et al.,

Defendants.

No. 1:25-cv-02079-AS

NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 65 and 57, Plaintiffs hereby move this Court to issue a Preliminary Injunction enjoining, among other things detailed in the Proposed Order, University Defendants from complying with coercive and constitutionally impermissible demands from Government Defendants, enjoining the Government Defendants from coercing the University Defendants to punish and suppress Plaintiffs' speech and associations, as well as a declaratory judgment establishing the unlawfulness of Defendants' conduct, pending further proceedings before this Court. In support of this Motion, Plaintiffs respectfully submit a Memorandum of Law and supporting Declarations and Exhibits in a separate filing. Pursuant to the Stipulation and Protective Order entered by this Court at Dkt 73, the full unredacted text of the Memorandum of Law in support of this Motion and Plaintiff Declarations are filed under seal, with the partially redacted version of the Memorandum of Law filed publicly via ECF as required.

As detailed in the accompanying Memorandum of Law and supporting materials, the Committee on Education and Workforce in the U.S. House of Representatives sent a February 13, 2025, letter to Katrina Armstrong, then Interim President of Columbia University, as well as David Greenwald and Claire Shipman, co-chairs of the Trustees of Columbia University demanding that Columbia University produce *all* of the student disciplinary records related to eleven separate incidents on campus, likely encompassing records of over 100 students, by February 27, 2025.

On March 13, 2025, the Federal Agency Defendants made a series of demands to Columbia University to punish and suppress the speech and association of Plaintiffs and others holding their views. On March 21, 2025, just after Plaintiffs filed this case, Columbia Defendants issued a letter wherein they signaled their intent to comply with the Federal Agency Defendants' demands. Since then, Columbia Defendants have taken steps to enforce the new policy changes as directed by Government defendants.

Plaintiffs file this Motion for a Preliminary Injunction seeking relief from the Government Defendants' unconstitutional demands and any unconstitutional compliance or future compliance by Columbia Defendants, as detailed in the Proposed Order filed with this Motion.

Dated: June 20, 2025

Respectfully Submitted,

/s/ Amy E. Greer

Amy E. Greer (NY 5910179) (lead counsel)
Dratel & Lewis
29 Broadway, Suite 1412
New York, NY 10006
(212) 732-8805
agreer@dratellewis.com

**CAIR NATIONAL
LEGAL DEFENSE FUND**

/s/Lena Masri

Lena Masri

Gadeir Abbas (VA 81161)*

Nadia Bayado (DC 90023648)

453 New Jersey Ave SE

Washington, DC 20003

(202) 742-6420

**COUNCIL ON AMERICAN ISLAMIC
RELATIONS – NEW YORK**

/s/Lamyia Agarwala

Lamyia Agarwala (NY 5736061)

80 Broad Street, 5th Floor

New York, NY 10009

(646) 665-7599

lagarwala@cair.com

Jonathan Wallace

/s/ Jonathan Wallace

Jonathan Wallace (NY 1733757)

PO #728

Amagansett NY 11930

(917) 359-6234

jonathan.wallace80@gmail.com

**Licensed in VA, practice limited to federal matters*

Attorneys for Plaintiffs